

Marc Wolstenholme
5 Shetland Close
Coventry, England CV5 7LS
Telephone: 044 7827964404
Email: marc@mvwolf-fiction.co.uk
Plaintiff in Pro Per

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

MARC WOLSTENHOLME,

Plaintiff,

vs.

RIOT GAMES, INC.,

Defendant

CASE NO. 2:25-CV-00053-FMO-BFM

HON. FERNANDO M. OLGUIN

PLAINTIFF'S DETAILED BREAKDOWN
AND ANALYSIS OF EPISODE 2:
SUPPORTING EVIDENCE FOR
COPYRIGHT INFRINGEMENT CASE

FEBRUARY 09, 2025

Dated this: FEBRUARY 09, 2025

M. WOLSTENHOLME.

[MARC WOLSTENHOLME]

Detailed Breakdown and Analysis of Episode 2: Supporting Evidence for Copyright

Infringement Case

1
2 **1. Introduction:**

3 I, Marc Wolstenholme, am the plaintiff in this matter, representing myself pro se.
4
5 This declaration is made as a Detailed Breakdown and Analysis of Episode 2: Supporting
6 Evidence for Copyright Infringement Case, to submit additional evidence relevant to my claims
7 against Riot Games, Inc. for copyright infringement, unfair competition, and intentional
8 infliction of emotional distress.
9

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11 **2. Evidence Submitted:**

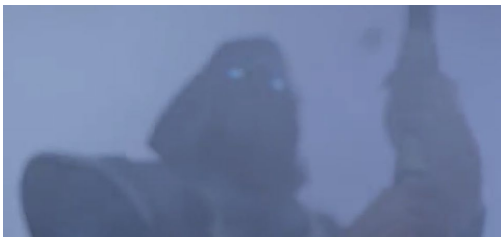
12 I submit the following evidence of Detailed Breakdown and Analysis of Episode
13 2: Supporting Evidence for Copyright Infringement Case. This is not an
14 exhaustive list, but serves to demonstrate key elements of my original work and
15 the substantial similarities between my work and the infringing material produced
16 by Riot Games, Inc.
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19 **3. Comparison of story elements:** This document specifically shows the
20 striking similarities between an assortment of episode 2 of Arcane.
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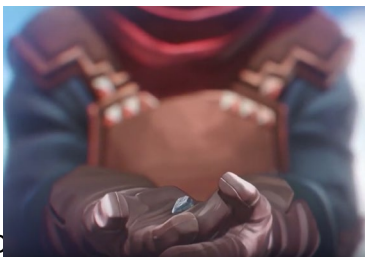
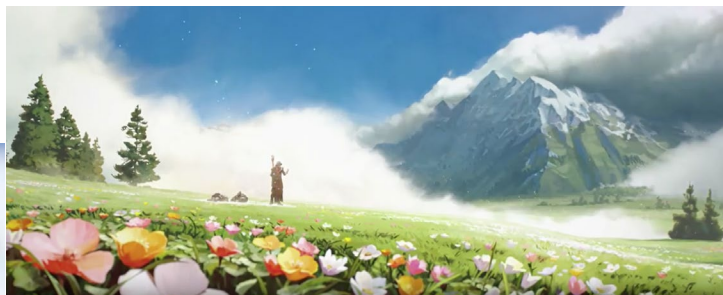
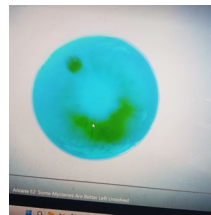
Exhibit

Exhibit A- Episode 2's cold opening with Jayce's teleportation.

A1. Episode 2 opens with Jayce being knocked out by the apartment explosion, then it flashes back to him and his mother trekking in a blizzard. His mother falls down, her fingers frost bitten. A wizard man (Mage) appears, he has glowing blue eyes. He magically spins a blue crystal on his hand. He has strange symbols tattooed on his fingers. He performs a ritual, waving his wand, then swirling it around the sky. Young Jayce and his mother are teleported up into the cosmos, they go whizzing through the universe. We see a round hex ball; it is in the palm of a faceless, hooded man, it turns into an earth like planet, then the planet spins, aligning with a moon, which becomes a pupil of an eye. The planet and the moon invert into an eye, and Jayce and his mother are transported to a spring meadow at the foothills of mountains. The wizard gives the young boy (Jayce) a magic crystal.



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ANALYSIS OF EPISODE 2: SUPPORTING EVIDENCE FOR COPYRIGHT
INFRINGEMENT CASE

1 **A2. The setting**



8 The setting of this scene matches that of Josh's home (4th quarter / Scotland) of
9 Rosh's POV in Bloodborg.

10
11
12 *BB- "My father and I use to shoot deer up in the mountains of the 4th quarter,*
13 *that's where I grew up."*

14
15 *BB- "I've accessed Deep-Root, mostly to read of the Old-World. The Concoction*
16 *(Rescogita) is more available in the 4th quarter because the mountains are harder to search."*
17

18
19 *BB- "I should never have joined; I want to go back to the 4th quarter."*

20
21 *BB- "but I do know your mother is safe and well in the 4th."*

22
23
24 *BB- "The only place I ever belonged was in the forest of the 4th, by my fathers'*
25 *side."*

A3. Ryze in Arcane.



In this scene where a mage rescues a young Jayce and his mother in a snowy region, this character is widely believed to have originally been Ryze, a prominent figure from the League of Legends universe. The images above are of Ryze and of the Mage (Viktor).

The first image, of Ryze, was made by a 2D artist who worked on Arcane. The mage's appearance and abilities align with Ryze's characteristics. Ryze is an ancient and powerful archmage known for his quest to collect and safeguard World Runes—fragments of immense magical power. His distinctive appearance includes blue skin and arcane scrolls, aligning with the depiction in the series.

In League of Legends, Ryze is recognized as one of the most adept sorcerers on Runeterra, bearing the heavy burden of preventing the misuse of World Runes due to their

1 catastrophic potential. His abilities in the game reflect his mastery over arcane magic,
2 emphasizing high burst damage and mobility.

3 The scene in Arcane where this mage utilizes teleportation magic to save Jayce
4 and his mother is consistent with Ryze's known capabilities, particularly his signature spell,
5 Realm Warp, which allows him to transport himself and others across distances. This portrayal
6 aligns with Ryze's lore and his role within the broader narrative of Runeterra.
7

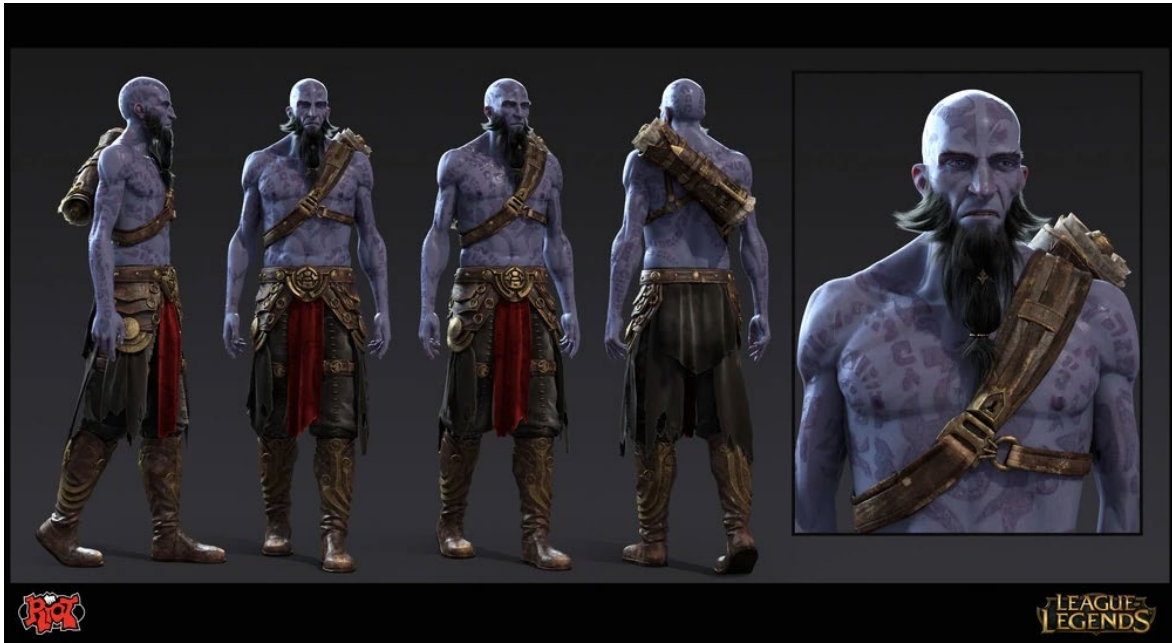
8 Therefore, it's reasonable to conclude that the mage in question was indeed Ryze,
9 but he must have been written out of the show, to make this character into Viktor during the
10 many reworks.
11

12 **Why does this matter?**

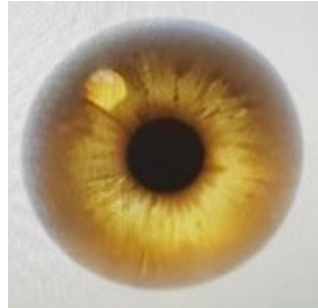
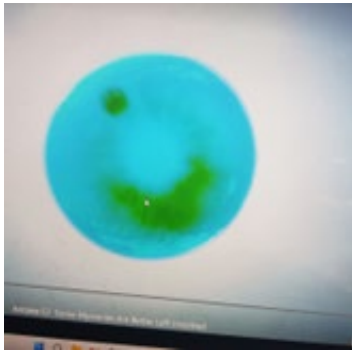
13 If using the "Pix N Mix" method of IP theft, which Riot Games are alleged to
14 have a long history of, one could easily slip Ryze into this narrative role, yet Viktor takes more
15 development and imagination to bring him aligned to a Bloodborg, which is what he is alleged to
16 have ended up as, completely retconning his lore and almost everything about his character.
17 Viktor in Arcane is not the same as Viktor in LOL. In fact, he is nothing like the original. The
18 Viktor of Arcane is closer to Ryze which my narratives overlapped.
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Ryze's original design

Many believe Ryze from League of Legends was designed as a rip-off of Kratos from God of War, because of the similarities between the two characters, such as their muscular builds, bald heads, facial structure, dark deep eyes, goatees, body patterns, clothing, general appearance and connections to ancient powers.



A4. Teleportation Eye.



In Bloodborg I wrote:

BB- “The smog began to energise- swirling up into the sky and dissipating into a gooey purple and blue rain. Lightening electrified the firmament, bruising the air.

He looked back to see the lightening was concentrating towards one point on the yard. A tiny bright white sphere appeared where the lightening had focused. The sphere grew, showering itself with blue, green, yellow and purple branches, like a vibrant iris. The iris looped in on itself, rotating inwards. A blackness opened from the centre of the sphere, an awoken pupil. A gale shot out of the pupil and lightning exploded, blueing up the world.

The blue faded and the ground around where the eye of the storm had been, steamed, evaporating all liquids around the area.”

In Arcane,

In Arcane we see this above written scene almost identically represented visually. From the smog (Mist/ fog) energizing and swirling up, to the eye iconography, use of colors, and even the snow evaporating in an instance. Moreover, this iconography of the eye, worlds and the higher consciousness is deeply embedded into Bloodborg and the whole of the M.W. Wolf Megaverse of Fiction and the underpinning scientific theory of the megaverse and consciousness (The IO-CU).

A5. To divulge narrative secrets to the court for the sake of transparency,

One of BlueBeam's literary functions is a satirical play on the Project Blue Beam conspiracy theory. If you go to the M.W. Wolf webpage, it can be observed that much of the M.W. Wolf catalog has satirical undertones.

In Bloodborg, BlueBeam energy is tied to blood energy and blood engineering, but this is implicitly implied in the manuscript. In short, the energy is a mix of Fusion energy, Blood engineering, electromagnetic and higher consciousness. It is used for weapons, to open inter dimensional portals, quantum entanglement and transportation via teleportation.

Bloodborgs are created via the same, yet in the manuscript, even the blood engineering goes deep into the science, describing how early state embryos produce trophoblasts and these are harvested from blood. BlueBeam, portrayed via technologies, aesthetics and eyes are therefore major plot and structure features of Bloodborg.

Yet the use of said literary devices goes even deeper. The M.W. Wolf Megaverse of Fiction books are interlinked in a spaghetti-like universe, much like Stephen King and Brandon Sanderson have achieved. BlueBeam and using eyes as a storytelling device ties into The Inverted Organelle theory of consciousness and the universe (IO-CU). The IO-CU is a real-life scientific theory of everything. The IO-CU also underpins all of the M.W. Wolf Megaverse of Fiction. Eyes are organs of the body which connect consciousness and the internal universe to the perceived outside universe. Eyes are the organ in which reality is inverted.

<https://www.mwwolf-fiction.co.uk/the-inverted-organelle>

Thus, these elements of Bloodborg, also in Arcane, are not just uses of an eye or a blue ball to look cool. The meaning and use in the story goes far deeper than anything which could be perceived as chance. Yet, in Arcane, they flash eyes but do not link it to any meaning, and even Hex tech is left ambiguous, seemingly retconning Riot's history of Hextech.

A6. Mysterious figure who teleported Jayce.



1 **In my Bloodborg Manuscript** this is B – B is a disguised ancient cyborg
2 sorcerer, she teleported Warwick away as he was about to die. She shows up mysterious in times
3 of crisis or near death. She also shows up to help Rook and others.
4

5
6 **In the Bloodborg Synopsis I wrote:**

7 *“B is a mysterious fiery hair woman who helps Rook (New Kowloon) and Josh*
8 *(The Ark) to survive. It is not revealed, but it is implicitly implied that she is an ancient cyborg.*
9 *She was ... police sergeant during the ... tower block fires. She was also selected for the Cyborg*
10 *experiments. It is not explored in this book but...*

11
12 *The Ark believed she died, so they are not looking for her. She cannot go to the*
13 *Ark as ...”*
14

15 **In my Bloodborg Manuscript:**

16 *“A shadow fell from the heavens slicing the Feral Fighters in half with a katana,*
17 *gliding as the cyborg did. Blood splattered over Rook’s face. She looked up into the sunlight,*
18 *shielding her eyes with her hand... She held out her hand, helping Rook to her feet. Rook pressed*
19 *her fingertips into the skin of the woman, her arm was firm as a rock under the spongy skin.*
20

21 *‘Who are you,’ said Rook, still squeezing the arm.*

22 *‘Call me B,’ she said, smiling.*

23 *‘Why did you help me B.’*
24

25 *‘Your destiny is greater than this, in time you will shed your skin, leave your shell*
26 *to become queen of the re-build. You are needed,’”*
27

Exhibit B. Jayce's Forearm Device.

B1. In Arcane Season 1, Episode 2, after the intro, Jayce is arrested and, while in his cell, he reflects on a crystal given to him by a mage during his childhood. This crystal is embedded in a bracelet on the inside of his forearm. This bracelet symbolizes his aspirations to harness magic through science. This progression highlights Jayce's journey from an ambitious inventor seeking to harness magic to a man profoundly altered by the very forces he sought to control.



In Season 2, Jayce's relationship with this crystal evolves significantly. After being trapped in an arcane anomaly, the crystal becomes forcibly embedded in his wrist, causing visible changes to his forearm. This transformation is not merely physical; it also affects his mental state, leading to increased paranoia and aggression. The crystal's integration into his body symbolizes a deeper connection to Hextech and the arcane, influencing his actions and decisions throughout the season.

Jayce's personality and appearance change after he escapes “the anomaly,” and he appears to suffer from mental disturbance. This is alleged to have been stolen from Warwick’s

1 struggles of the same after he has been transported away after “the Rupture” event. - Same,
2 same!

3 Jayce’s Forearm device is underutilized in Arcane. It is alleged that it too was
4 directly taken from Bloodborg or is “remarkably similar” to D’borg’s forearm device, also fused
5 to the inside of her forearm.
6

7
8 **In Bloodborg I wrote:** *“She looked down at the inside of her forearm. Inside her*
9 *arm, attached to her was a device in the shape of a figure of eight. She traced her finger over the*
10 *figure of eight, it rose from her arm and out flicked a globe with several glowing spots. She*
11 *zoomed in to a blue spot, the Air-blade. She rotated the figure of eight zooming it down onto a*
12 *point near the Air-blade, hovering over an open-top building. Energy built up in the air around*
13 *her, cocooning her in a ball of electric, she panted hard as the cocoon thickened, insulating her*
14 *from being ripped apart during teleportation, like an egg transported through a fallopian tube.*
15 *With an almighty crash of thunder and a blinding bolt of white light, she was gone.”*
16
17

18
19 **Later-** *“She pushed a button on an infinity symbol like device embedded into her*
20 *forearm. The infinity symbol popped up out of her arm, it shot out a blue ray, which mapped the*
21 *city and projected it up as a hologram... pushed her arm twice, The City’s three main districts in*
22 *her hologram zoomed down, mapping over an Old-world map of New Kowloon.”*
23
24

25 **Later-** *“A control device in the shape of the infinity symbol, dropped out of the*
26 *inside of her forearm and bounced on the rails. Warwick peered down at it. A hologram of the*
27

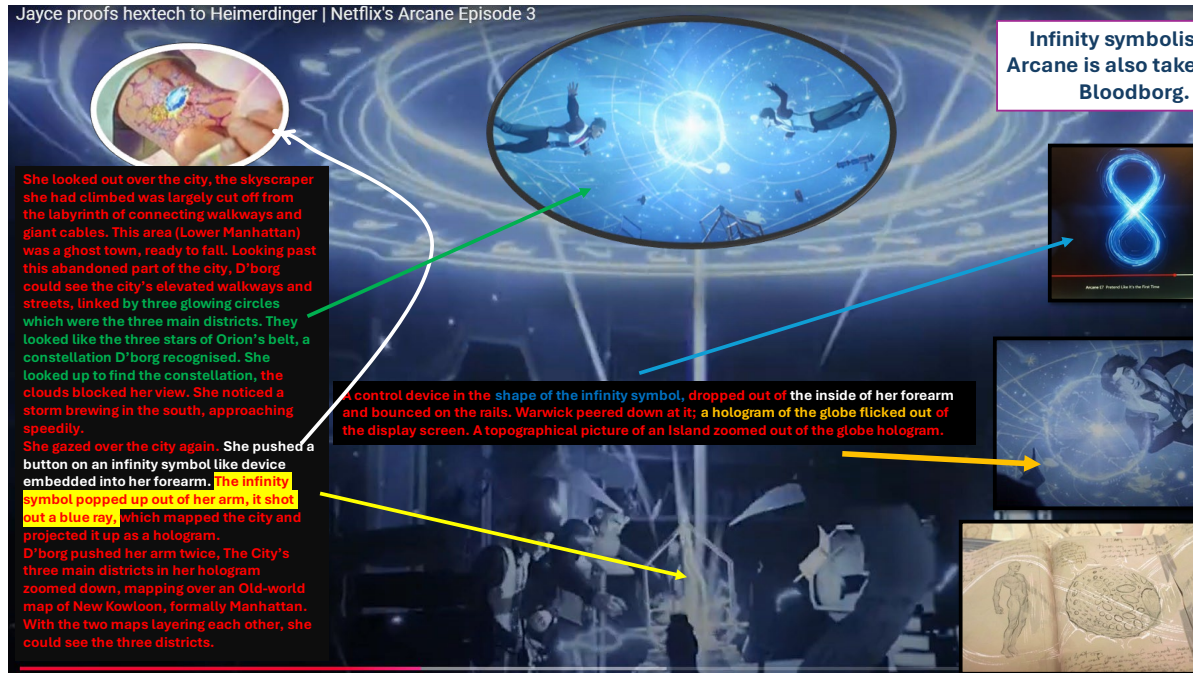
1 *globe flicked out of the display screen. A topographical picture of an Island zoomed out of the*
2 *globe hologram. Warwick recognised the Island instantly; it was The Ark, it was once a great*
3 *place...”*

4 **B2. Further Usage**

5
6 Additionally, many of the worldbuilding and narrative examples presented above,
7 are alleged to have been “Cut up” and “Pix n Mixed” into Arcane and used directly at different
8 points in the series. We see the same elements mentioned above: *shape of a figure of eight,*
9 *flicked a globe with several glowing spots, energy built up in the air, cocoons, ball of electric,*
10 *teleportation, egg, blue rays, maps of city and worlds, and projected up as holograms,* used
11 repeatedly in Arcane. That’s over 10 unique pieces of world and story building in Arcane,
12 remarkably similar to the three passages sampled above.
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B3. Infinity symbolism.

The three samples heavily depict Infinity symbolism, electric blue and projected mapping of worlds and cities, which is precisely how hextech transportation is depicted in Arcane. This was not a feature of hextech before Arcane.



C. Fight Practice with adoptive brothers

The next scene is fighting practice. Vi is boxing training and Powder is shoot training.



This is just to show the depth of their deceptive tactics; I will not be relying on it in court.

This practice scene is a bit of a trope but that figures, as Arcane was created via the Pick-N-Mix from the Bloodborg manuscript by M.W. Wolf.

BloodBorg- *“She recalled her mother and father practising in the moonlight with wooden swords, balancing barefooted on a pipe. She recalled Momma Grace’s ballet dancing teachings and the stick play with her brothers Matteo and McCauley. She recalled the re-enactment sword battles with Roy.”*

D. Crab Factory & Shimmer Vines.

D1. Rail line.

The crab market of Silco’s lair appears to have originally been a train station, alleged to have been converted to hide IP infringement.



In Bloodborg, the episode 3 fight scene equivalent happens on the sky rail line shortly after leaving a station, perhaps they changed the railway station to a crab market to hide the IP infringement.



Why does it have a railway station window?

Why does it have a wheel?



Why does it have an iron bridge rail bridge between platforms?



Why do they have a section of rail track hanging (sleeper)?

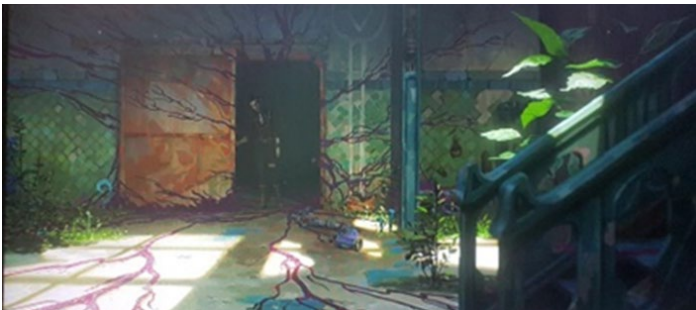


1 **Why do they have railway steel cargo doors?**

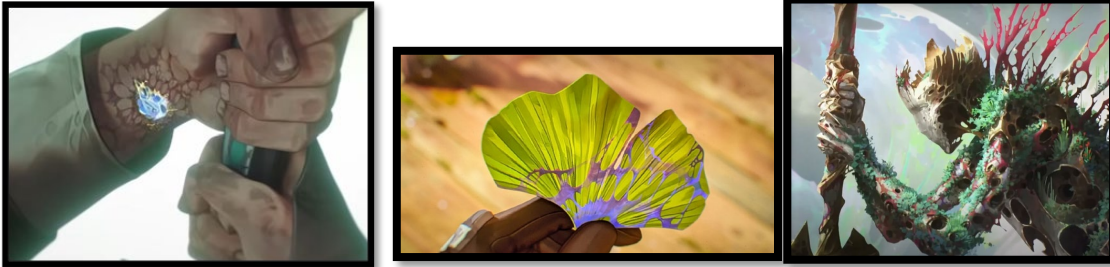


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12 **D2. Shimmer Vines.**

13 In Arcane the Shimmer blood vines are meant to be different from “the
14 corruption” which we see in season 2. They look the same, yet it seems that Arcane uses these
15 vines to be flammable, to cause Singed’s chemical burns.



1 In Season 2 of Arcane, we see “the corruption” in many places. Ther magic tree,
2 Jayce’s forearm and the Viktor robot thing, just to name and show a few examples.



11 **In Bloodborg,** these vines also have two functions. One is Mother Gaia
12 reclaiming the blood corruption of the earth, essentially purging humanities corruption. The
13 second use is bionic Rot.

14
15 **In Bloodborg-** *“Weeds and strange yellow spiky finger like marine flora, climbed*
16 *the walls of the stair well, squeezing into the cracked plaster, and pulling at the brickwork, as if*
17 *Mother Gaia was dragging the building down into the water- her stomach acid.”*

18
19
20 **BB-** *“I’ve heard of bionic rejection and bionic fever, even bionic rot but never*
21 *have I heard of spontaneous combustion.”*

22
23
24 **BB-** *“He didn’t mention is bionic leg, but it looked painful when he limped, I*
25 *wonder if he has bionic rot. I felt a bit sorry for him, I read that once bionic parts are fitted they*
26 *merge with the host, the theory (highly contested) proposes that, over time the bionics, or to be*

1 *precise, the synthetic bacteria (symbiacta) used to create symbiosis, stops working with the*
2 *bionics and the body. The bacteria's appetite increases, it becomes greedy and starts to eat away*
3 *at both the bionic parts and the body."*
4

6 **D3. Conclusion of Shimmer Vines and The Corruption**

7
8 In Both Bloodborg and Arcane, we see these creepy vain like root system
9 growths. In both works, they are two different but connected phenomena. In Bloodborg, the first
10 use is Mother Gaia reclaiming the blood corruption of the earth. In Arcane its shimmer blood
11 vines, seemingly the same, less for the color.
12

13 The second use in Bloodborg is Bionic Rot. In Arcane this is the same, but it is
14 called "The corruption" and in the parallel realm this rot's all the bionics and the human flesh,
15 same, same.
16

17 **Flammable** – In Bloodborg, severe cases of Bionic Rot can cause spontaneous
18 combustion. This is foreshadowing of a plot device for later in the trilogy. In Arcane, it is the
19 other one (Shimmer Vines) which are flammable.
20

21 In fact, the two are not very well understood by the "Creators" nor audience of
22 Arcane.
23
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E. Silco making Deals with Topside.

In Arcane, we then see Silco (Cowboy) making deals with a Topsider Enforcer named Marcus. This parallels Vander making deals with Grayson. Again, we see the same parallel literary devices used in both Bloodborg and Arcane, in the same manner, for the same incidences. We later see Silco making deals with Jayce. Again, the same function, reworked.



1 **In Bloodborg,**

2 BB- “‘So what? So people trade with the Assemblage, so people do dodgy deals.
3 Not everything is as black and white as you see it Warwick. Not everyone needs to die because
4 they don’t follow your rules. You’re just like Morgan, overthinking, overreacting and
5 overprotective.’”

6
7 BB- “‘They do not care, my dealings with people of this district go way back, I’m
8 like the neighbour they love to hate, but they still come knocking when they need a cup of
9 sugar.’”

10
11 BB- “‘You’re working for the Inner Assemblage. You must be to have equipment
12 and technology like that.’

13 ‘No, I’m Not Marvin, but I do know you have taken bribes from them, I’ve known
14 for a long time, I’ve let you get away with it because you’re an easy brain to pick, every time you
15 are fed information, that information ends up being leaked. Loose lips sink ships.’ he said,”

16
17
18 BB- “‘y’all bring that monkey climbing piggy fuck to me, is what you gonna do.
19 Aah wanna know who this yellah belly dog fucker working for, and why he ain’t working for me.
20 Aah ’m the diddy of this here District.’”

21
22
23 BB “‘How do you know Morgan hasn’t set this all up, how do you know he didn’t
24 set the Assemblage tracking device to find me. How do you know he isn’t working with the
25 Assemblage?’”

F. More Eye Iconography

We then see this glass dome-like window of Silco's underwater lair. This is again the same eye iconography used as a central feature in Bloodborg for a very specific and scientific reason, as previously examined. Yet In Arcane they just dash it around because its cool.

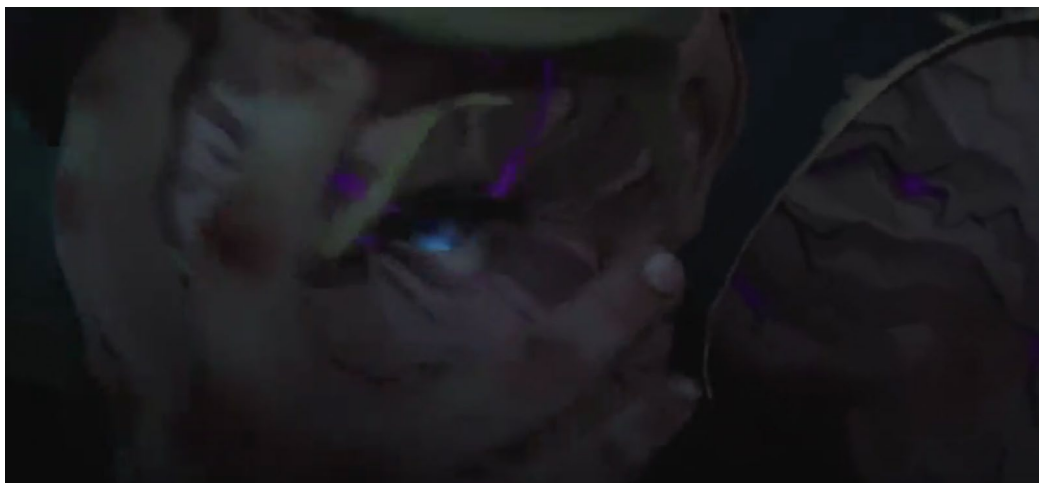


Bloodborg,

BB- "The Next jammer was on the SolarScape south line in the mini-transfer station; a dome-like building which hung on cables above the rails of the south line, like a giant glass snow globe."

G. Raging Mutated Deckard

Silco gives Deckard the blood-based serum called “Shimmer” and he turns into a
raging mutated being. Deckard roars out as he mutates.



In Bloodborg,

BB- “‘Just keep rowing gently and be silent,’ said Warwick, knowing that noise and movement and even light overloads the damaged brains of the infected and the mutated, sending them into a rage.”

BB- “The smell of blood excited the severely mutated.”

BB- “His body tickled with rage. Not like the blind rage of the mutated, more of an emotionally charged rage of a damaged man.”

BB- “...most of the mutated are barely people anymore and the others...”

BB- “The frenzy had begun, the mutated raged on,...”

BB- “Screeches of the mutated echoed through the band of standing boulders.”

BB- “The smog and dust settled down into silence for a few seconds before the surrounding buildings roared. The Mutated ran out,...”

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H. Vander's War is bad speech.

Warwick warns Vi of the effects and trauma of War, like she didn't know after her parents were killed. This too is a central theme of Bloodborg.



BB- "War is messy, it hurts. Both here and here," said Bill, pointing to his heart and his head. "Let me just tell you, the first day of war is always the worst, it doesn't get better, but you get tougher and rougher and numb, both here and here," he said, pointing at his heart and head again."

BB- "war can scramble things a little inside your skulls."

BB- "'Listen kid, you can shoot, I'll give you that. Bloody great shot, I'll have you on a sniper's course if you get through the war. But war isn't just about shooting, I see Officer

1 *Bennet has you moving well, ducking into cover and all, but still, war is more than that. You got*
2 *to protect what's in here,' said Sgt Salt, tapping his forefinger on my forehead"*
3

4
5 *BB- "You'd have been called to duty now that the war has started anyway,*
6 *joining early has given you a few weeks practice. Josh, if it makes you feel any better, I went*
7 *through the same feeling when I joined, and to be honest, after all these years, I still hate the way*
8 *it is. I don't enjoy killing, I'm not a psychopath, but I believe in the cause, I believe in saving the*
9 *race.'"*
10

11
12 *BB- "I'm thinking about what B said to me, that this war is a lie, a distraction. I*
13 *wonder if all major wars of the world have been the same. I wonder if war has always been the*
14 *central weapon of oppression. Have the people of the world always been hypnotised into*
15 *obedience and submission by war and conflict, by divide and conquer?"*
16

17
18 *BB- "A sinister smile desecrated his face. The man who war made, lay here. The*
19 *boy who Chris made, had gone. "*
20

I. Jayce / D’borg suicide idealizations.

After not being allowed to play with Hextech anymore, Jayce balances on the edge of the apartment, contemplating suicide. Viktor stops him. He says, “Am I interrupting?” Jayce later does the same for Viktor, saying the same.



BB- “D’borg sat up and wiped her eyes. The rain had pushed north yet the evening sky was still moist. She stood up, onto the ledge of the building, with her arms out wide and considered jumping into the smog and smashing off the buildings and departing this painful existence. She felt a jab in her shoulder, the impact knocked her off the ledge and back onto the roof. She looked up to see an Air-blade scanning her for damage. She pulled the dart out.”

J. Pneumatic tubes



BB- "...pushing three, pint-sized bullet capsules into the tubes and pushing the button on the dispenser. The capsules shot off up the tubes."

Analysis & Evaluation of Episode 2 Evidence

The evidence submitted in relation to Episode 2 of Arcane presents a structured comparison between the plaintiff's original work, Bloodborg, and the series' narrative choices, visual elements, and thematic structures. The allegations primarily revolve around striking similarities in specific plot devices, world-building elements, and character developments. The document presents a comprehensive breakdown of alleged direct borrowing from Bloodborg, emphasizing the extent of overlap in concept execution, symbolic iconography, and storytelling mechanisms.

Key areas of concern include:

1. Teleportation and Eye Iconography – The document identifies how Arcane's portrayal of magical teleportation and its visual execution aligns with Bloodborg's detailed descriptions, particularly the use of blue energy spheres, iris-like motifs, and the thematic significance of eyes and higher consciousness.
2. Character and Setting Parallels – Several settings in Arcane appear to match closely with locations in Bloodborg, particularly mountainous terrains and dystopian environments. Additionally, the shift in Viktor's character and his narrative arc away from his original League of Legends

lore suggests a reinterpretation allegedly influenced by Bloodborg's character structure.

3. Technological Devices and Biomechanical Elements – The description of Jayce's forearm device in Arcane bears strong resemblance to the embedded technology in Bloodborg, including a holographic interface, mapping abilities, and an infinity-symbol aesthetic. The plaintiff argues that these visual and functional similarities are too precise to be coincidental.

4. Bionic Rot and Corruption Motif – The representation of shimmer vines and corruption in Arcane aligns with Bloodborg's themes of biomechanical decay, specifically referencing "Bionic Rot." The use of vines in Arcane, both as a biological affliction and as a thematic world-building element, is presented as an allegedly altered but substantially similar adaptation of Bloodborg's concepts.

5. War and Psychological Themes – Both works appear to include extensive discussions on war, its psychological effects, and its thematic importance. The plaintiff argues that Arcane lifts specific dialogue structures and moral reflections directly from Bloodborg, especially in discussions about the nature of war and trauma.

1
2 6. Suicidal Ideation and Narrative Mirroring – The document details how
3 Jayce’s near-suicide scene mirrors Bloodborg’s protagonist's moment of
4 despair, down to the intervention by another character. This recurrence of
5 identical themes, phrasing, and narrative beats is presented as evidence of
6 direct influence.
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9 **Conclusion**

10 The evidence presented outlines multiple detailed correspondences between
11 Arcane and Bloodborg, strengthening the plaintiff’s claim of systematic borrowing. While some
12 similarities may fall within the realm of general storytelling tropes, the repeated and layered
13 nature of these parallels across multiple elements—visual, thematic, and narrative—raises
14 significant concerns regarding potential intellectual property infringement. Given the extensive
15 documentation of these overlaps, the court may consider this evidence when determining the
16 merit of the plaintiff’s claims and assessing whether substantial similarities constitute actionable
17 infringement under copyright law.
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Legal Citations Supporting the Plaintiff's Claims:

Substantial Similarity Standard

Feist Publ'ns, Inc. v. Rural Tel. Serv. Co., 499 U.S. 340 (1991)

This case established that copyright protects the original expression of ideas, not the ideas themselves. If Arcane has borrowed the detailed execution of Bloodborg's themes, characters, settings, or narrative structure, it could be deemed an infringement.

Sid & Marty Krofft Television Prods., Inc. v. McDonald's Corp., 562 F.2d 1157 (9th Cir. 1977)

Courts use the "extrinsic and intrinsic test" to determine substantial similarity. The plaintiff has outlined both objective (extrinsic) elements such as visual, thematic, and narrative correspondences, and subjective (intrinsic) elements that indicate a common "look and feel" between Bloodborg and Arcane.

Access and Copying

Three Boys Music Corp. v. Bolton, 212 F.3d 477 (9th Cir. 2000)

Establishes that direct evidence of copying is not required. If the defendant (Riot Games) had access to Bloodborg (which has been alleged through prior submissions to industry insiders, literary agents, and Riot-affiliated networks), and there exists substantial similarity, a presumption of copying may be made.

Sheldon v. Metro-Goldwyn Pictures Corp., 81 F.2d 49 (2d Cir. 1936), aff'd 309
U.S. 390 (1940)

Copying does not need to be wholesale—even modifications or alterations of
protected elements can still constitute infringement.

Independent Creation Defense (Refutation)

Walker v. Time Life Films, Inc., 784 F.2d 44 (2d Cir. 1986)

Riot Games may argue that their similarities to Bloodborg arise from independent
creation. However, the striking similarities—particularly in character arcs, world-building
motifs, trauma writing, and visual execution—suggest more than mere coincidence, rebutting the
notion of independent development.

Moral Rights & Misappropriation of Themes and Characters

Gaiman v. McFarlane, 360 F.3d 644 (7th Cir. 2004)

Recognized that a derivative work without authorization infringes on the author's
copyright. If Arcane's rework of Bloodborg altered enough elements to avoid blatant copying but
still retained the core protected elements, it may still be an infringement.

1 **Visual and Cinematic Elements Protection**

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3 Metcalf v. Bochco, 294 F.3d 1069 (9th Cir. 2002)

4
5 The "total concept and feel" of a work, including specific details and sequences,
6 can be protected. The plaintiff's claim regarding Arcane's use of teleportation iconography,
7 biomechanical themes, and character parallels could support an infringement case under this
8 precedent.

9 **Industry Fraud and Bad Faith (If Proven)**

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11 Wrench LLC v. Taco Bell Corp., 256 F.3d 446 (6th Cir. 2001)

12 Establishes liability for misappropriation if a company solicits ideas under false
13 pretenses and later uses them without credit or compensation.

14
15 If Riot Games solicited material from agencies and literary submissions,
16 dismissed them, and later used those ideas without credit, this could suggest fraudulent conduct
17 in addition to copyright infringement.
18

1 **Declaration**

2 I, Marc Wolstenholme, declare under penalty of perjury under the laws of the
3 United States of America that the foregoing is true and correct to the best of my knowledge and
4 belief. I submit this declaration in support of my Detailed Breakdown and Analysis of Episode 2:
5 Supporting Evidence for Copyright Infringement Case, providing a detailed comparison of the
6 alleged infringement of my original work, Bloodborg, by Riot Games, Inc.
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11 The Plaintiff, Marc Wolstenholme, M.W. Wolf.

12 Date: FEBRUARY 09, 2025

13 Signed: *M. WOLSTENHOLME*
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